

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re LEHMAN BROTHERS SECURITIES  
AND ERISA LITIGATION

Case No. 09-MD-2017 (LAK)

ECF CASE

This Document Applies To:

*In re Lehman Brothers Equity/Debt  
Securities Litigation*, 08-CV-5523 (LAK)

**NOTICE OF LEAD COUNSEL’S MOTION FOR AN AWARD OF  
ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION  
EXPENSES IN CONNECTION WITH THE EY SETTLEMENT**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court’s December 3, 2013 Order Concerning Proposed Settlement with Defendant Ernst & Young LLP (“EY”) [ECF No. 542; MDL ECF No. 1350], and upon the Joint Declaration of David Stickney and David Kessler in Support of (A) Plaintiffs’ Motion for Final Approval of Class Action Settlement with Defendant Ernst & Young LLP and Approval of Plan of Allocation and (B) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses In Connection with the EY Settlement; and all other papers and proceedings herein, Lead Counsel will and do hereby move this Court on April 15, 2014, at 4:30 p.m. in the Courtroom of the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York 10007, or at such other location and time as set by the Court, for entry of

an Order awarding attorneys' fees and reimbursement of Plaintiffs' Counsel's litigation expenses.

DATED: March 11, 2014

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ David R. Stickney

DAVID R. STICKNEY

MAX W. BERGER  
1285 Avenue of the Americas, 38th Floor  
New York, NY 10019  
Tel.: (212) 554-1400  
Fax: (212) 554-1444

-and-

DAVID R. STICKNEY  
NIKI L. MENDOZA  
BRETT M. MIDDLETON  
12481 High Bluff Drive, Suite 300  
San Diego, CA 92130  
Tel.: (858) 793-0070  
Fax: (858) 793-0323

**KESSLER TOPAZ  
MELTZER & CHECK, LLP**

/s/ David Kessler

DAVID KESSLER

DAVID KESSLER  
GREGORY M. CASTALDO  
KIMBERLY JUSTICE  
JENNIFER L. ENCK  
280 King of Prussia Road  
Radnor, PA 19087  
Tel.: (610) 667-7707  
Fax: (610) 667-7056

*Co-Lead Counsel for Plaintiffs  
and the Settlement Class*